

DISTRICT OF OREGON                 )  
County of Multnomah               ) ss: AFFIDAVIT OF SPECIAL AGENT  
  ) GUY GINO

## Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Guy Gino, being duly sworn, do hereby depose and state as follows:

## Introduction and Agent Background

I, Special Agent Guy Gino, being first duly sworn, depose and say:

## Introduction and Agent Background

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have been so employed since 2003. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), and I am authorized by law to conduct investigations and to make arrests for felony offenses. I am currently assigned to the Assistant Special Agent in Charge, Portland, Oregon. I previously served as a U.S. Border Patrol Agent and have been a federal law enforcement officer since September 1996. I am authorized and assigned to investigate violations of federal laws, including 18 USC 119. During my tenure as a federal law enforcement officer, I have investigated and/or participated in investigations of conspiracy, money laundering, narcotics trafficking, assault, fraud, smuggling and theft. I am currently assigned to the Hatfield United States Courthouse (USCH) in Portland Oregon in support of a joint facility protection and civil disturbance operation.

2. I have experience investigating crimes against federal employees including threats and assaults on federal government employees, to include law enforcement officers.

3. I submit this affidavit in support of a criminal complaint and arrest warrant for Tawasi. As set forth below, there is probable cause to believe, and I do believe, that Tawasi committed the following offense: 18 U.S. Code § 119 (Protection of individuals performing

certain official duties).

4. The facts set forth in this affidavit are based on the following: my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, my review of records related to this investigation, communication with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, it does not set forth each fact that I or others have learned during this investigation.

#### **Applicable Law**

5. Pursuant to Title 18 U.S.C § 119(a)(2), in relevant part, it is unlawful for any person to knowingly make restricted personal information about a covered person publicly available with the intent and knowledge that the restricted personal information will be used to threaten, intimidate, or facilitate the commission of a crime of violence against that covered person.

#### **Statement of Probable Cause**

6. Since May 26, 2020, protesters have gathered in Portland public areas to protest. Three of these public areas are Lownsdale Square, Chapman Square and Terry Schrunk Plaza. The Portland Justice Center, housing Portland Police Bureau's (PPB) Central Precinct and the Multnomah County Detention Center (MCDC), borders these parks, as does the Mark O. Hatfield United States Federal Courthouse. The United States of America owns the entire city block (Block #24) occupied by the courthouse building.

7. For the past 56 days, daily protests have been regularly followed by nightly criminal activity in the form of vandalism, destruction of property, looting, arson, and assault. Additionally, mounted building security cameras and access control devices have been vandalized or stolen. Federal properties in the area have been routinely vandalized, including the historic Pioneer Federal Courthouse, the Gus Solomon Courthouse, and the Edith Green Wendall Wyatt Federal Office Building. In response to these criminal acts the Departments of Homeland Security (DHS) and Justice (DOJ) have deployed additional resources in the form of personnel and equipment to Portland, Oregon. Federal law enforcement personnel consisting of U.S. Border Patrol Agents (USBP), Federal Protection Service Officers (FPS), U.S. Marshal Service Deputies (USMS), Immigration and Customs Enforcement Officers (ICE), Homeland Security Investigations (HSI) Special Agents have arrived in Portland, Oregon to protect the federal personnel and properties being attacked by these criminal agitators. Since their arrival they have been subjected to various assaults in form of physical assault, aerial fireworks used as mortars discharged at them, high intensity lasers targeting their eyes, projectiles thrown at them which include rocks, frozen bottles of waters, glass bottles and balloons filled with paint, feces and urine. They also have received verbal threats and targeted vulgar language from demonstrators while performing their duties.

8. The harassment, threats and intimidation have also occurred on various online social media platforms where individuals have called for violence and are urging others to perform acts of violence, harassment or intimidation targeting not only the law enforcement personnel but the local businesses that the U.S. Government is paying to house, transport and feed the various federal agency personnel temporarily detailed to the Portland, Oregon area.

9. On July 12, 2020, I was made aware that an individual identified by the Twitter username “@TawasiSoce” had posted on their twitter page:

*"Tell Portland Marriott to stop housing violent federal goons."*

User @TawasiSoce also provided a phone number to a local Marriott hotel.

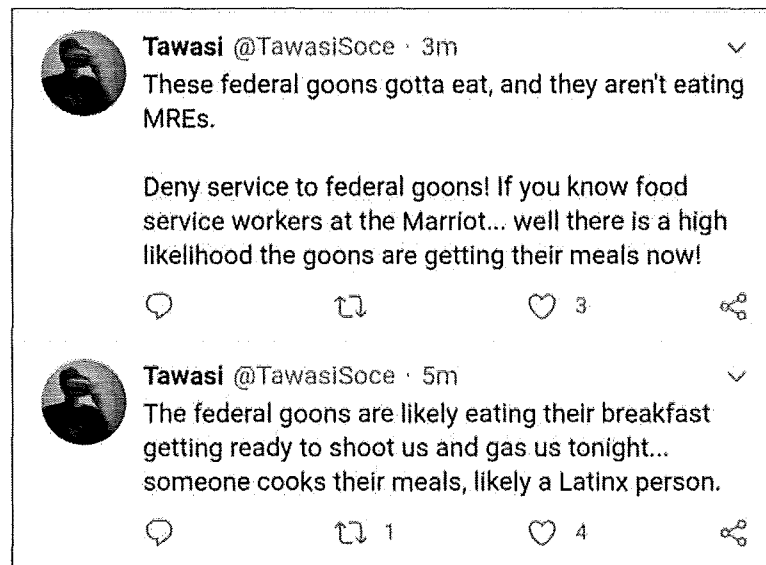
10. I observed that one (1) hour after the initial post, @TawasiSoce posted a video filmed from across the street of two random guests of the hotel walking at a park with the title “*Feds out of costume*” with a link for people to watch the video which clearly shows @TawasiSoce was conducting video surveillance of individuals @TawasiSoce assumed were federal law enforcement.

11. I observed that six (6) hours later, @TawasiSoce posted two screenshots from the earlier posted video and also posted:

*"These goons come out of their goon dens. We gotta be there then to tell them they are not welcome."*

12. As result, I began to review the public posts that @TawasiSoce has uploaded to various social media sites.

13. As part of this investigative review, I observed that on July 17, 2020, @TawasiSoce uploaded several posts to the Twitter platform that I believe call for the intimidation of federal officers, who are covered persons under 18 U.S.C. § 119. In one post, I believe @TawasiSoce encouraged Marriott employees to tamper with the food being served to the Federal law enforcement officers. The post is observed below:



I know from my training and experience that experienced twitter users who engage in threats or intimidation of others or who seek to incite threats or intimidation of others through electronic communication typically do so in a veiled or ambiguous manner. I believe that this post is an implied attempt to encourage food service providers to tamper with law enforcement food.

14. In another separate post, @TawasiSoce tweeted :

*"Individuals can get a room at the Marriott waterfront for about \$150.*

*Fog horns are about \$15.*

*Federal goons who shoot us at night are trying to sleep right now.*

@TawasiSoce followed that post with another stating *"if you don't personally want to do this but like the idea...*

*Allegedly I know a guy who would do the reservation making.*

*Cashapp  
\$ tawasi*

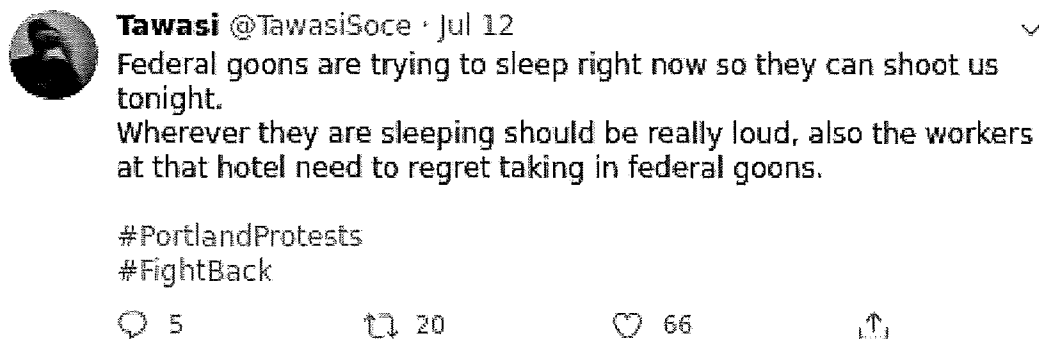
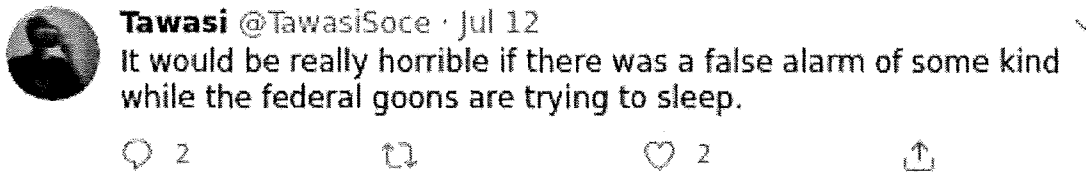
*Venmo  
@ Tawasi"*

Based on my training and experience I believe @TawasiSoce not only intended to motivate other individuals to threaten or intimidate federal law enforcement officers, I also believe that @TawasiSoce was also willing to assist in the facilitation of those threats or intimidation by providing a manner that would allow others to book reservations anonymously.

15. On July 18, 2020, I observed that @TawasiSoce again posted to the Twitter platform :

*"This is your daily reminder that federal goons are trying to sleep right now.  
Many are in cushy beds at the Marriott waterfront.  
Also Jantzen beach Marriott residence.  
And Hyatt house.  
So long as the people have no justice..."*

16. A further review of his social media accounts I was observed the following posts:





**Tawasi** @TawasiSoce · Jul 13

The federal goons who shot portlanders last night and have been terrorizing us for weeks are trying to get their beauty sleep.

We know generally where are, deny the comfort and ease while they occupy our home.



**Tweet**



**Tawasi**

@TawasiSoce

No peace for feds trying to sleep  
at waterfront Marriot.

They shoot us all night, give them  
no peace all day.

#PortlandProtests

9:56 AM · 17 Jul 20 · Twitter for Android



**Tawasi** @TawasiSoce · Jul 19

These federal goons don't cook their own meals. They gotta rely on locals to feed and support them.

Deny service to federal goons!

Or better yet drag their order, serve it cold. Give them nothing on time or good.

#PortlandProtests



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**Big Snack Wanter**  
@TawasiSoce



The feds who shot, gassed and likely  
RAPED last night are trying to lay  
down to sleep right about now.

DO NOT LET THEM!

Give No Peace To Federal goons at  
the motels in Portland.  
#PortlandProtests

8:35 AM · Jul 20, 2020 · Twitter for Android



**Big Snack Wanter**  
@TawasiSoce



This is the time of day to catch the  
goons out of their combat gear in their  
cushy rooms at the Marriot  
waterfront.

If you know how to stage a sit in, or  
lock down this is the time.

#PortlandProtests  
#WallOfMoms

10:18 AM · Jul 20, 2020 · Twitter for Android

8 Retweets 14 Likes





**Tawasi** @TawasiSoce · 22h

Re: feds trying to sleep after a night of attacking unarmed H2O bearing moms and dads.

They have been confirmed at two different Marriot and the hytt house.

No peace for violent federal goons!

Also these seem highly affordable.



17. I also observed the following replies to @TawasiSoce's posts.



**Nus** @CarpetSmanger · 9h

Replying to @TawasiSoce

Just lapped Marriot and Hyatt House. No activity now.

I'm down to show up at either spot and make some noise.





**Fred Baker** @FredTheFriendly · Jul 17

Replying to @TawasiSoce

It would suck if someone smoked a lot of incense and somehow set off the fire alarm



18. On July 23, 2020, @TawasiSoce posted a video to his Twitter page Stating “Security.” I reviewed the video and observed that he inadvertently captured his vehicle’s license plate, which I observed to be Oregon license plate 629HGK. I know the vehicle in the video to be the same red Nissan Leaf vehicle for which he has posted several photos of himself in or near as well as videos of himself driving.

19. On that same day, I reviewed Oregon DMV database records which identified that Oregon license plate 629HGK is registered as a 2012 Nissan whose registered owner is listed only by the name “Tawasi.” During my review of the DMV records, I observed the DMV drivers license photograph of Tawasi.

20. Later that evening @TawasiSoce posted a livestream to his Twitter account which revealed that he was currently located near the Mark O. Hatfield Courthouse. I recognized @TawasiSoce as the same individual that help the Oregon Drivers license under the name Tawasi.

21. A surveillance team comprised of myself and US Border Patrol agents were able to locate Tawasi’s vehicle parked just east of the Federal Courthouse where we waited for him to return to his vehicle.

22. A few hours later we observed Tawasi return to his vehicle and depart the area. Surveillance was maintained on Tawasi, who was later arrested in Northeast Portland.

**Conclusion**

23. Based on the foregoing, I have probable cause to believe, and I do believe, that Tawasi violated Title 18 U.S.C § 119. I therefore request that the Court issue a criminal complaint and arrest warrant for Tawasi.

24. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Sarah Barr, and AUSA Barr advised me that in her opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

By phone - Rule 4.1  
Guy Gino  
Special Agent  
Homeland Security Investigations

Sworn to by telephone or other reliable means at 12:40 a.m./p.m. in accordance with  
Fed. R. Crim. P. 4.1 this 24<sup>th</sup> day of July 2020.

[Signature]  
HONORABLE JOHN V. ACOSTA  
United States Magistrate Judge